

REMARKS

Reconsideration and allowance of the present application based on the following remarks are respectfully requested. Claims 1, 6, 13, and 14 have been amended to more clearly define Applicants' invention and to correct certain informalities. No new matter has been added. Thus, upon entry of this Amendment, claims 1-15 will be pending in this application.

Applicants note that the Examiner has cited U.S. patents to Hayashi and Takahashi et al. that are family members of GB 2299867A and EP 1041607A1, respectively. It is respectfully submitted that these foreign references have been considered as defined in MPEP § 609.

Claims 1-6, 8-10, and 13-15 were rejected under 35 U.S.C. § 102(b) over Ohsaki (U.S. Patent No. 6,038,013). Applicants respectfully traverse this rejection.

Independent claim 1 recites, *inter alia*, a detector to observe relative movement between a first and a second portion of the vibrationally isolated portion of the apparatus. In contrast, Ohsaki discloses acceleration sensors (5Z₁, 5Z₂, 5Z₃, 5Y₁, 5Y₂, and 5X) that detect acceleration of the first column (24) in the Z, Y, and X directions (Col. 11, lns. 42-61), and displacement sensors (10A, 10B, and 10C) that detect relative movement between the first column (24), which is part of the exposure apparatus main body part (40), and the columns (35A and 35B) that are fixed to the pedestal (2). (Col. 11, ln. 62 – col. 12, ln. 14; Col. 12, lns. 46-61; Col. 13, lns. 18-23; FIG. 1). The columns (35A and 35B) that are fixed to the pedestal (2) are not part of a vibrationally isolated portion of the apparatus. Hence, Ohsaki does not disclose or suggest a detector that observes relative movement between a first and a second portion of the vibrationally isolated portion of the apparatus. Ohsaki merely discloses a detector to observe relative movement between a vibrating isolated portion of the apparatus and the rest of the apparatus. With respect to claims 6 and 8, Applicants respectfully submit that the pedestal (element 2) cannot be considered the main plate because the pedestal (2) is not part of the vibrationally isolated portion of the apparatus. (See Col. 6, lns. 26-45). Accordingly, Applicants submit that claim 1 and dependent claims 2-13 are patentable over Ohsaki and respectfully request that the rejection be withdrawn.

Independent claim 14 recites a method that includes, *inter alia*, detecting relative movement between at least a first and a second portion of a vibrationally isolated portion of the apparatus. For the reasons discussed above, Ohsaki does not disclose or suggest a method that includes detecting relative movement between at least a first and a second portion of a

vibrationally isolated portion of the apparatus. Claim 15 claims a device that is manufactured by the method of claim 14. Because Ohsaki does not disclose or suggest the method of claim 14, Ohsaki cannot disclose or suggest a device that is manufactured in accordance with the method of claim 14. Accordingly, Applicants submit that claims 14 and 15 are patentably distinct over Ohsaki and respectfully request that the rejection be withdrawn.

Claims 1-10 and 14-15 were rejected under 35 U.S.C. § 102(b) over Takabayashi et al. (U.S. Patent No. 5,187,519). Applicants respectfully traverse this rejection.

Takabayashi et al. discloses an acceleration pickup sensor (16) and a displacement sensor (17) that measures the displacement of the movable portion of the mount (12). (Col. 6, Ins. 37-44). The mounts (12) are not part of a vibrationally isolated portion of the apparatus. (See FIG. 1). Hence, Takabayashi et al. does not disclose or suggest a detector that observes relative movement between a first and a second portion of the vibrationally isolated portion of the apparatus. Accordingly, Applicants submit that claim 1 and dependent claims 2-13 are patentable over Takabayashi et al. and respectfully request that the rejection be withdrawn.

Similarly, Takabayashi et al. does not disclose or suggest a method that includes detecting relative movement between at least a first and a second portion of a vibrationally isolated portion of the apparatus. Because Takabayashi et al. does not disclose or suggest the method of claim 14, Takabayashi et al. cannot disclose or suggest a device that is manufactured in accordance with the method of claim 14. Accordingly, Applicants submit that claims 14 and 15 are patentably distinct over Takabayashi et al. and respectfully request that the rejection be withdrawn.

Claims 1-10 and 13-15 were rejected under 35 U.S.C. § 102(e) over either Hayashi (U.S. Patent No. 6,388,733) or Takahashi et al. (U.S. Patent No. 6,441,884). Applicants respectfully traverse these rejections.

Hayashi discloses sensors (44A and 44B) for determining the relative position of the illumination system (37) and the exposure machine main portion (39) (Col. 7, Ins. 30-65; Col. 9, Ins. 38-49). The level sensor (23) detects the tilt of the platen (6) relative to the horizontal plane. (Col. 8, Ins. 1-2). The acceleration sensor (30) detects linear acceleration of the platen (6) relative to the X-, Y-, and Z-directions and also rotational accelerations for the rotation in the X-Y plane, the Y-Z plane, and the X-Z plane. (Col. 8, Ins. 2-13). Hence, Hayashi does not disclose or suggest a detector that observes relative movement between a first and a second portion of the vibrationally isolated portion of the apparatus. Accordingly,

Applicants submit that claim 1 and dependent claims 2-13 are patentable over Hayashi and respectfully request that the rejection be withdrawn.

Similarly, Hayashi does not disclose or suggest a method that includes detecting relative movement between at least a first and a second portion of a vibrationally isolated portion of the apparatus. Because Hayashi does not disclose or suggest the method of claim 14, Hayashi cannot disclose or suggest a device that is manufactured in accordance with the method of claim 14. Accordingly, Applicants submit that claims 14 and 15 are patentably distinct over Hayashi and respectfully request that the rejection be withdrawn.

Takahashi et al. discloses displacement sensors (26A and 26B) that detect relative displacement between two optical systems (10A and 10B) (Col. 12, lns. 12-16), not between a first and a second portion of the vibrationally isolated portion of the apparatus. Accordingly, Applicants submit that claim 1 and dependent claims 2-13 are patentable over Takahashi et al. and respectfully request that the rejection be withdrawn.

Similarly, Takahashi et al. does not disclose or suggest a method that includes detecting relative movement between at least a first and a second portion of a vibrationally isolated portion of the apparatus. Because Takahashi et al. does not disclose or suggest the method of claim 14, Takahashi et al. cannot disclose or suggest a device that is manufactured in accordance with the method of claim 14. Accordingly, Applicants submit that claims 14 and 15 are patentably distinct over Takahashi et al. and respectfully request that the rejection be withdrawn.

Applicants appreciate the indication that claims 11 and 12 define patentable subject matter. However, in view of the above remarks, it is respectfully submitted that all of the claims are allowable and that the entire application is in condition for allowance.

All rejections and objections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975, reference number 081468/0284994. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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